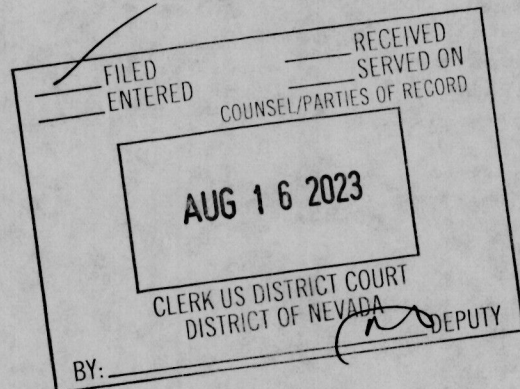


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**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JOSHUA AARON JAMES,

and

ZALTON BROOKS,

Defendants.

CRIMINAL INDICTMENT

Case No.: 2:23-cr-0150-JCM-EJY

VIOLATIONS:

18 U.S.C. §§ 922(a)(1)(A), 923(a) and
 924(a)(1)(D) – Engaging in the Business of
 Dealing or Manufacturing Firearms
 Without a License

18 U.S.C. §§ 2, 922(a)(1)(A), 923(a) and
 924(a)(1)(D) – Engaging in the Business of
 Dealing or Manufacturing Firearms
 Without a License (Aiding and Abetting)

18 U.S.C. § 933(a)(1) and (b) – Trafficking
 Firearms

18 U.S.C. §§ 2, 933(a)(1) and (b) –
 Trafficking Firearms (Aiding and Abetting)

18 U.S.C. §§ 922(g)(1) and 924(a)(8)
 Felon in Possession of a Firearm

THE GRAND JURY CHARGES THAT:

COUNT ONE

Engaging in the Business of Dealing Firearms Without a License
(18 U.S.C. §§ 922(a)(1)(A), 923(a) and 924(a)(1)(D))

On or about July 11, 2023, in the State and Federal District of Nevada,

JOSHUA AARON JAMES,

defendant herein, not being a licensed dealer, importer, and manufacturer of firearms within the meaning of Chapter 44, Title 18, United States Code, willfully engaged in the business of dealing in, importing, and manufacturing firearms, all in violation of Title 18, United States Code, Sections 922(a)(1)(A) and 924(a)(1)(D).

COUNT TWO

Engaging in the Business of Dealing Firearms Without a License
(18 U.S.C. §§ 2, 922(a)(1)(A), 923(a) and 924(a)(1)(D))

On or about July 11, 2023, in the State and Federal District of Nevada,

**JOSHUA AARON JAMES, and
ZALTON BROOKS,**

defendants herein, aiding and abetting one another, not being a licensed dealer, importer, and manufacturer of firearms within the meaning of Chapter 44, Title 18, United States Code, willfully engaged in the business of dealing in, importing, and manufacturing firearms, and aided and abetted the same, all in violation of Title 18, United States Code, Sections 2, 922(a)(1)(A) and 924(a)(1)(D).

COUNT THREE

Trafficking Firearms
(18 U.S.C. §§ 933(a)(1) and (b))

On or about July 11, 2023, in the State and Federal District of Nevada,

JOSHUA AARON JAMES,

defendant herein, knowingly transported, transferred, caused to be transported, and otherwise disposed of firearms to another person, in and affecting interstate and foreign

1 commerce, knowing and having reasonable cause to believe that the use, carrying, and
2 possession of said firearms by the recipient would constitute a felony, as defined in 18
3 U.S.C. § 932(a), all in violation of Title 18, United States Code, Section 933.

4 **COUNT FOUR**

Trafficking Firearms

5 (18 U.S.C. §§ 2, 933(a)(1) and (b))

6 On or about July 11, 2023, in the State and Federal District of Nevada,

7 **JOSHUA AARON JAMES, and**
8 **ZALTON BROOKS,**

9 defendants herein, aiding and abetting one another, knowingly transported, transferred,
10 caused to be transported, and otherwise disposed of firearms to another person, in and
11 affecting interstate and foreign commerce, knowing and having reasonable cause to believe
12 that the use, carrying, and possession of said firearms by the recipient would constitute a
13 felony, as defined in 18 U.S.C. § 932(a), and aided and abetted the same, all in violation of
14 Title 18, United States Code, Sections 2 and 933.

15 **COUNT FIVE**

Felon in Possession of a Firearm

16 (18 U.S.C. §§ 922(g)(1) and 924(a)(8))

17 On or about July 11, 2023, in the State and Federal District of Nevada,

18 **JOSHUA AARON JAMES,**

19 defendant herein, knowing he had previously been convicted of crimes punishable by
20 imprisonment for a term exceeding one year, that is: *Attempted Grand Larceny*, on or about
21 January 27, 2020, in the Eighth Judicial District Court of Nevada, under case number
22 C-19-345016-2; knowingly possessed twenty-nine (29) firearms, that is:

- 23 • IZHMASH (IMEZ), RIFLE, MODEL: UNKNOWN, CAL: UNKNOWN, SN:
24 1056917
- PRIVATELY MANUFACTURED FIREARM, RIFLE, MODEL:
UNKNOWN, CAL: ZZ, SN: NONE

- DPMS INC., RIFLE, MODEL: A15, CAL: 223, SN: 30297
- PRIVATELY MANUFACTURED FIREARM, RIFLE, MODEL: UNKNOWN TYPE, CAL: ZZ, SN: NONE
- ARMALITE, RIFLE, MODEL: M15A4, CAL: 556, SN: US41610
- ARGENTINA, RIFLE, MODEL: FM FAL, CAL: 762, SN: X01383
- ROMARM/CUGIR, RIFLE, MODEL: SAR-1, CAL: 762, SN: S1-06642-99
- ESSENTIAL ARMS INC, RIFLE, MODEL: J15, CAL: 223, SN: 042799
- ROMARM/CUGIR, RIFLE, MODEL: WASR-10, CAL: 762, SN: 1-32057-2002
- TAURUS, REVOLVER, MODEL: THE JUDGE, CAL: 45/410, SN: DS232110
- PROFESSIONAL ORDNANCE, PISTOL, MODEL: CARBON 15, CAL: 556, SN: B22107
- NORINCO, RIFLE, MODEL: AK47S, CAL: 762, SN: 84S-317975
- CZ (CESKA ZBROJOVKA), PISTOL, MODEL: UNKNOWN, CAL: 32, SN: 295132
- AUTO ORDNANCE, RIFLE, MODEL: THOMPSON 1927 A-1, CAL: 45, SN: KA3159
- L.A.R. MFG, RIFLE, MODEL: GRIZZLY BIG BOAR, CAL: 50 BMG, SN: X000638
- NORINCO, RIFLE, MODEL: AK47S, CAL: 762, SN: 9300042
- MAADI COMPANY, RIFLE, MODEL: MISR, CAL: 762, SN: CM09177
- CZ (CESKA ZBROJOVKA), PISTOL, MODEL: CZ52, CAL: 762, SN: F10410
- IZHMASH (IMEZ), RIFLE, MODEL: SAIGA, CAL: 762, SN: 993166
- CZ (CESKA ZBROJOVKA), PISTOL, MODEL: UNKNOWN, CAL: 32, SN: 399115
- HECKLER AND KOCH, RIFLE, MODEL: HK91, CAL: 308, SN: A051010
- AMERICAN DERRINGER CO, DERRINGER, MODEL: M-4 ALASKAN SURVIVAL, CAL: 45/410, SN: 112406
- HECKLER AND KOCH, TYPE: RIFLE, MODEL: HK91, CAL: 308, SN: A019010
- ROHM, TYPE: DERRINGER, MODEL: DOUBLE DERRINGER, CAL: 22, SN: 28960
- HARRINGTON AND RICHARDSON, PISTOL, MODEL: UNKNOWN, CAL: UNKNOWN, SN: 28371
- DSA INC., RIFLE, MODEL: SA58, CAL: 308, SN: DS11287

- 1 • MOSIN-NAGANT, RIFLE, MODEL: UNKNOWN TYPE, CAL: ZZ, SN: 9130-5249
- 2 • F.N. (FN HERSTAL), RIFLE, MODEL: UNKNOWN TYPE, CAL: ZZ, SN: 32654; and
- 3 • INGLIS, MK1 BOYS, RIFLE, CALIBER: .50, SN: 4T9299;

4
5 said possession being in and affecting commerce and said firearms having been shipped and
6 transported in interstate and foreign commerce, all in violation of Title 18, United States
7 Code, Sections 922(g)(1) and 924(a)(2).

8 **COUNT SIX**

9 *Felon in Possession of a Firearm*
(18 U.S.C. §§ 922(g)(1) and 924(a)(8))

10 On or about July 11, 2023, in the State and Federal District of Nevada,

11 **ZALTON BROOKS,**

12 defendant herein, knowing he had previously been convicted of crimes punishable by
13 imprisonment for a term exceeding one year, that is: *Financial Transaction Card Fraud* and
14 *Forgery*, on or about June 24, 1994, in the Clayton County Superior Court of Georgia; and
15 *Financial Transaction Card Theft*, on or about June 21, 1994, in the Clayton County Superior
16 Court of Georgia; and *Theft by Receiving Stolen Property*, on or about April, 24, 1998, in the
17 Laurens County Superior Court of Georgia; and *Habitual Violator*, on or about September
18 14, 1998, in the Houston County Superior Court of Georgia; and *Willful Obstruction of Law*
19 *Enforcement Officers by Use of Threats of Violence* and *Habitual Violator*, on or about January 30,
20 2001, in the Houston County Superior Court of Georgia; and *Contempt of Court*, on or about
21 August 21, 2003, in the Houston County Superior Court of Georgia; and *Terroristic Threats*
22 *and Acts*, on or about April 23, 2009, in Houston County Superior Court of Georgia; and
23 *Habitual Violator*, on or about June 27, 2013, in the Houston County Superior Court of
24 Georgia; knowingly possessed a firearm, that is: INGLIS, MK1 BOYS, RIFLE, CALIBER:

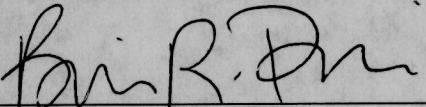
1 .50, BEARING SERIAL NUMBER 4T9299; said possession being in and affecting
2 commerce and said firearms having been shipped and transported in interstate and foreign
3 commerce, all in violation of Title 18, United States Code, Sections §§ 922(g)(1) and
4 924(a)(2).

5 **DATED:** this 16th day of August, 2023.

6 **A TRUE BILL:**

7
8 /S/
FOREPERSON OF THE GRAND JURY

9
10 JASON M. FRIERSON
United States Attorney

11 

12 BIANCA R. PUCCI
13 Assistant United States Attorney
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